

DATA PROTECTION DECLARATION of Zirl Stahl Produkte GmbH

Zirl Stahl Produkte GmbH (in the following as 'ZIRL STAHL') endeavours to comply with the data protection regulations, particularly those of the **General Data Protection Regulation of the EU (Regulation 2016/679) - abbreviated to 'GDPR' in the following**, when using your personal and business-related information and data. The following declaration informs you how ZIRL STAHL saves, processes and also protects personal data, including and specifically names, dates of birth, business data, addresses, telephone numbers and email addresses.

This declaration is intended for all customers and suppliers who are in existing/maintained business relationships with us and those who may enter into suitable business relationships in the future.

The entity responsible for data protection as defined in the GDPR is:

**Zirl Stahl Produkte GmbH, registered under No. FN 359409v with Graz District Court for Civil Matters,
represented by its CEO Marcus Zirl
Waldhof, Mantscha 30 , 8052 Graz/Austria**

For all enquiries relating to data protection, please contact:

marcus.zirl@zirl-stahl.at or telephone: +43 (316) 8333 01

1. HOW AND FOR WHICH PURPOSES DO WE PROCESS PERSONAL DATA?

It is generally possible to use our website without entering personal data. If personal data (such as names or email addresses) is required to be entered in our pages (in a contact form or to provide a comment), this is always optional for any user. Without your express authorisation, this data will not be released to third parties. When you access our site, certain information for the purposes of data security will be temporarily stored by our server (e.g. IP address, date, time and designation of data requested); on the basis of this information, it may be possible to identify the user. Data will not be used for evaluation except in anonymised form for statistical purposes.

In general, the following data may be collected by our website:

- data concerning the use
(e.g. web pages viewed, interest in content, time of access).
- meta- and communication data
(e.g. device information, IP addresses)
- contact data
(e.g. names, email addresses if these are actively entered (in forms)).
- content data
(e.g. entered text, if this is actively entered (in forms)).

If you make direct contact with us (e.g. using our contact form, by email, telephone or by other means), the information you provide will be used to process and deal with your enquiry as permitted under Art. 6, 1. (b) GDPR.

For the purposes of providing and executing our services, we will process your personal data and any other data that you supply us with voluntarily, such as company names, personal names, addresses, email addresses, telephone numbers, business data, personal data etc. If the information required for building the business relationship is not provided, we may not be able to, in whole or in part, fulfil or comply to your order. Personal data is thus processed by us exclusively for the purpose of undertaking our commercial business activities; in other words, for the preparation, justification and management of the business relationship we have entered into or will enter into with you and also to comply with other legal requirements, and/or if we have a legitimate interest in processing such data (for promotional reasons, in particular), in so far as this is not outweighed by your right to the maintenance of secrecy.

2. ON WHICH LEGAL BASIS DOES ZIRL STAHL PROCESS YOUR DATA?

If you are already a business partner of ZIRL STAHL, we will process your personal data if this is unavoidable and necessary for the performance under the contractual relationship to you (Art. 6, 1. (b) GDPR). Otherwise, your personal data will be processed by ZIRL STAHL when this is necessary for the purposes of the justified legitimate interests pursued by us per section 1 above (Art. 6, 1. (f) GDPR)

3. WHICH PERSONAL DATA IS PROCESSED BY ZIRL STAHL?

In addition to the data you have provided to us voluntarily, we will also process data that we have ourselves obtained or which is necessary to obtain for the full completion of the order, such as information on company size, branch, street address, post code, city and country as well as data available from publicly accessible sources, as company registers and land registers etc..

4. TO WHOM IS PERSONAL DATA TRANSMITTED?

If this is absolutely necessary for the purposes specified in section 1 above, ZIRL STAHL will transmit your data to the following recipients:

- business partners/suppliers/contractors/customers/forwarding agents/carriers/shipping companies (it may in cases be necessary to supply the data to several of the agents cited here)
- chambers of commerce
- insurance providers and insurance agents
- relevant experts
- banks for the purposes of payment processing and crediting
- tax and customs authorities
- other public bodies
- tax consultancies and auditing firms
- IT service providers commissioned by us
- other recipients specified by our business partners
- to other recipients in order to meet legal obligations, whereby the legal basis for data processing in this case is Art. 6, 1. (c) GDPR

All data processors commissioned by us (e.g. for accounting, IT service providers) will be supplied with data only for the purposes of providing the corresponding service. All data processors are contractually obligated to treat personal data as strictly confidential and to process this only in accordance with the defined purpose for which we have commissioned them.

It is possible that certain of the above-specified recipients may be located outside Austria and that your data may be processed outside Austria. If any recipients of your personal data are outside the EEA and in a country which the EU Commission has determined does not provide an appropriate level of data protection, we will ensure that data is supplied only in accordance with the standard contractual clauses (currently 2010/87/EC and/or 2004/915/EC) or under the guarantees of the EU-US Privacy Shield.

5. HOW LONG WILL PERSONAL DATA BE STORED?

ZIRL STAHL will in general store your personal data until the termination of the business relationship in which connection ZIRL STAHL collected your data or until termination of the applicable legal limitation and retention periods that are specified, for example, in the form of the company and tax data retention regulations (e.g. the Austrian fiscal code – 7 years) or until termination of the statutory periods of limitation stipulated in the relevant civil codes (Austrian general civil law etc. – 3 years); moreover, your personal data will be stored until resolution of any legal disputes for which the data will be required to serve as evidence. If you are a business partner, former business partner, interested in a business relationship or a possible future business partner, ZIRL STAHL will store your data until you object to this or withdraw your consent to the storage of your data.

6. WHAT RIGHTS DO YOU HAVE AS A DATA SUBJECT?

ZIRL STAHL is obligated to give you the right to:

- require confirmation as to whether and which of your personal data is being processed by ZIRL STAHL and to provide you with copies of this data (Art. 15, GDPR)
- rectification of data (Art. 16, GDPR)
- erasure of incorrect data or data for which there are no legal grounds for processing (Art. 17, GDPR)
- restriction of processing (Art. 18, GDPR)
- data portability (Art. 20, GDPR)
- objection (Art. 21, GDPR)
- in addition, we are obligated to notify you of the rectification or erasure of personal data or restriction of processing (Art. 19, GDPR).

You also have the right to withdraw your previously provided consent, whereby withdrawal of consent will have no effect on the legality of processing of data prior to the time point at which you withdrew your consent. If you withdraw your consent, ZIRL STAHL will immediately terminate processing for the purpose in question, assuming that processing is only legitimate on the basis of your consent and there are no exceptions in the form of legal or contractual requirements that make storage of the data necessary until these requirements terminate.

To make use of your rights, please notify us in writing (by email or by post) using the contact data specified at the beginning of this declaration. To avoid the possibility of misuse of any of the above-specified rights by unauthorised persons, please ensure that you confirm your identity for us in a suitable form.

7. INFORMATION ON GOOGLE ANALYTICS/COOKIES

This website uses Google Analytics, a web analytics service provided by Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA, ('Google' in the following). Data is processed in accordance with the legal stipulations of Art. 96, Subs. 3, Austrian Telecommunications Act and Art. 6, 1. (a) 'Consent', GDPR. Google Analytics uses so-called 'cookies', which are text files placed on your computer to help the website analyse how users use the site. Temporary cookies that are deleted as soon as a user leaves our website and closes their browser are also known as 'session' cookies or 'transient' cookies. Cookies that remain stored after the browser has been closed are known as 'permanent' or 'persistent' cookies. 'Third party' cookies are those supplied by providers other than the website operator (the cookies provided by the operator are known as 'first party' cookies). We have the right to use temporary and permanent cookies. If you do not wish to allow cookies to be stored on your device, please use the corresponding options to deactivate them by means of the system settings of your browser. Saved cookies can also be deleted using the system settings of your browser.

The information on your use of our website collected by cookies (including your IP address) will be transmitted to a Google server in the USA and stored there. Google will employ this information to evaluate your use of our website, to generate reports on website activities for the website operator and to provide other services in connection with website and internet use. This information may be transmitted by Google to third parties if this is legally required or third parties process this data on behalf of Google. Google will never connect your IP address with other Google data. You can prevent the installation of cookies by means of the appropriate setting of your browser software; however ZIRL STAHL would like to point out that this may prevent you being able to use all the features of our website in full.

You can generally opt out of the use of cookies for online marketing for many purposes, particularly with regard to tracking, by visiting the US website <http://www.aboutads.info/choices/> or the EU website <http://www.youronlinechoices.com/>. In addition, you can deactivate the storage of cookies with the help of your browser settings. Please note that in this case, you may not be able to use all the features of our online services.

Moreover, we also use "Google Tag Manager" as a necessary technical service to connect Google analytical and marketing services (see below) to our website and to manage these. Google Tag Manager does not install cookies and does not store personal data. Without the explicit consent of the user, an empty container only will be uploaded, and no personal data will be processed. To view the Privacy Policy of Google, please go to: www.google.com/policies/privacy.

By using this website, you consent to the processing of your data collected by Google in the form and manner described above and for the purposes specified.